

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JEFFREY ISAACS, M.D.,)
Plaintiff,)
v.) C.A. No. 1:17-cv-11221-FDS
UNITED STATES DEPARTMENT)
OF EDUCATION,)
Defendant.)

MOTION TO SEAL THE ADMINISTRATIVE RECORD

Defendant, by and through its attorney, Andrew E. Lelling, United States Attorney for the District of Massachusetts, moves to seal the administrative record in this lawsuit.

The record in this Administrative Procedure Act case contains Plaintiff's medical, educational, and financial information. It contains documents submitted by Plaintiff to Defendant in connection with his requests to discharge his educational loans as well as information provided to Defendant by a medical school that Plaintiff attended. The record also contains details of a confidential settlement agreement. Because this information appears throughout the record, it would be very burdensome for Defendant to file only portions of the administrative record under seal. Further, such a presentation of the record would disrupt the order and flow of documents produced, thereby making it more difficult for the Court to evaluate the case.

To protect the copious amount of personal information contained in this administrative record and preserve the clarity of the record as a whole, Defendant respectfully requests permission from the Court to file the administrative record under seal. Plaintiff has assented to this motion.

Respectfully submitted,

UNITED STATES DEPARTMENT OF
EDUCATION

By its attorney,

ANDREW E. LELLING
United States Attorney

By: /s/ Annapurna Balakrishna
Annapurna Balakrishna (BBO#655051)
Assistant United States Attorney
One Courthouse Way, Suite 9200
Boston, Massachusetts 02210
(617) 748-3111
annapurna.balakrishna@usdoj.gov

Date: January 5, 2018

L.R. 7.1 Certification

Plaintiff assented to this motion via email on January 4, 2018.

/s/ Annapurna Balakrishna
Annapurna Balakrishna
Assistant United States Attorney

Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), on January 5, 2018.

/s/ Annapurna Balakrishna
Annapurna Balakrishna
Assistant United States Attorney